

METHODS OF ADMINISTRATION USED TO IMPLEMENT PART 84 REQUIREMENTS ON
NONDISCRIMINATION ON THE BASIS OF HANDICAP

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1. Assignment of Responsibility for Implementation of Section 504.

The Department has designated a responsible person to coordinate agency efforts to assure that each program or activity for which it receives Federal financial participation will be operated in accordance with the provisions of the Rehabilitation Act of 1973 and Part 84 of the Code of Federal Regulations, and that no individual shall on the ground of handicap, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. This designated person is on the agency's top management staff and has been appointed the Civil Rights Coordinator for the agency.

The Civil Rights Coordinator is directly responsible for:

- a. acting as liaison between the Agency and the Office for Civil Rights
- b. acting as liaison between the Agency and groups representing the handicapped, or other community groups concerned with the delivery of services
- c. preparation of compliance reports for submission to the Office for Civil Rights
- d. monitoring essential records and files relative to Civil Rights and the civil rights programs of the Agency

The Civil Rights Coordinator retains primary responsibility, with delegation of direct responsibility to appropriate Agency units, for:

- a. dissemination of Section 504 information to Agency staff, clients, and interested members of the general public
- b. insuring that training and technical assistance are provided to Agency staff on Section 504 and the needs of the handicapped
- c. handling of complaints of discrimination
- d. conducting compliance reviews of non-medical vendors and their facilities.

2. Section 504 Training

The Bureau of Staff Development is responsible for training Agency staff to be aware of the needs of handicapped clients and to recognize possible barriers to their full participation in the Agency's programs.

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3. Section 504 Compliance by Other Participants

The Medical Assistance Program Administration is responsible for ensuring compliance by medical vendors. This is accomplished by:

- a. including compliance as a requirement to be met for participation; with compliance encompassing acceptance of the responsibility for referral of patients to alternative sources of medical care and services, when appropriate to insure accessibility.
- b. including a compliance statement on all claims submitted by vendors for reimbursement.
- c. monitoring periodic reviews of hospital and group care facility practices conducted by the agency responsible for licensure and certification.

4. Dissemination of Information to Beneficiaries and the General Public

The Policy and Planning Administration and the Office of Public Information coordinate and share responsibility for informing beneficiaries, potential beneficiaries and the public through the use of brochures, notices, radio, television and bulletin boards, that the service, financial aid and other benefits are provided on a nondiscriminatory basis.

Program brochures, the Agency pamphlet "Public Aid and Civil Rights", and the notice sent to clients all include notification of the right to file a complaint if it is believed that there has been discrimination on the basis of handicap.

5. Section 504 Complaint Policy and Procedure

The Division of Field Operations is responsible for:

- a. providing clients and potential clients, through the local Public Aid offices, the pamphlet "Public Aid and Civil Rights" that gives information as to the method for filing a complaint
- b. assuring that corrective action is taken by the local offices when findings so warrant
- c. assuring that no person who has filed a complaint, testified, assisted, or participated in any manner in the investigation of any complaint is intimidated, threatened, coerced, or discriminated against

The Policy and Planning Administration is responsible for:

- a. coordinating the investigation of a complaint to determine whether or not discrimination did occur
- b. advising the complainant, in a timely fashion, of the disposition of the complaint and of the right to appeal to the Office for Civil Rights if not satisfied with the Agency's decision
- c. maintaining records which show the nature of the complaint, the details of the investigation and the actions taken by the Agency

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In those cases where the complaint is initially filed with the Office for Civil Rights, the Civil Rights Coordinator is responsible for arranging an investigation when the Agency is requested to conduct one. The Coordinator and the Agency Director review the action taken on complaints.

6. Written Nondiscrimination Policy

The Agency has written policy and procedure on nondiscrimination that is included in the categorical assistance manuals and in the Agency Rules and Regulations that are filed with the Secretary of State.

7. Recruitment and Employment Practices

The Civil Rights Coordinator, the Bureau of Personnel Management and the Illinois Department of Personnel share responsibility in assuring that no qualified handicapped person is subjected to discrimination in employment on the basis of handicap.

An Agency brochure "Equal Employment Opportunity is for Everybody" specifies the Agency's nondiscrimination policy.

The Bureau of Staff Development authorizes training and educational leave for Agency employees in a nondiscriminatory manner.

8. Planning, Advisory and Policy Boards

The Director's office coordinates and assures that the opportunity to participate as members of planning, advisory and policy boards is available to all persons in a nondiscriminatory manner.

9. Continuing Compliance

The Civil Rights Coordinator is responsible for monitoring, on a continuing basis, all aspects of the Agency's operation to assure that no policy or practice is, or has the effect of, discriminating against clients or other participants on the basis of handicap. Agency procedures that are monitored include, but are not limited to, such areas as:

- a. location of offices and facilities
- b. manner of assignments of applicants/clients to staff
- c. dissemination of program information
- d. criteria for acceptance into Agency programs
- e. referral of clients to other agencies and facilities
- f. referral sources
- g. tests
- h. utilization of handicapped vendors

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- i. use of volunteers, consultants, etc.
- j. applications for assistance
- k. provision of services
- l. records
- m. handicapped persons on planning, advisory and policy boards
- n. program accessibility to handicapping persons
- o. auxiliary aids for persons with impaired sensory, manual, or speaking skills

10. Program Accessibility

The Bureau of Office Facilities and Services and the Illinois Department of General Services share responsibility for searching for and acquiring office facilities that are accessible to, or usable by, handicapped persons, and arranging for needed modifications.

11. Specific Section 504 Requirements for Hospitals and Institutions

Inasmuch as hospitals and other institutions are directly accountable to the Department of Health, Education and Welfare with respect to compliance, the Agency accepts the HEW determination of compliance for participating hospitals and institutions. In addition, such providers are required to certify compliance by the submittal of claims that include a compliance statement.

The Illinois Office of Education is the agency responsible for monitoring the provision of appropriate educational services for handicapped persons of school age.

12. Corrective Requirements

The Civil Rights Coordinator, who is also the Agency's Affirmative Action Officer, is responsible for initiating any modifications that are necessary in conditions that may have resulted in limiting the participation in the past of handicapped persons.

13. Compliance Reports

The Civil Rights Coordinator collects and maintains handicap data and information concerning the operation of the Agency which shows the extent to which handicapped persons are participating in all aspects of the Agency's programs. The Coordinator makes available to the Office for Civil Rights all data and information necessary to determine the Agency's compliance with Section 504 of the Rehabilitation Act of 1973, and the compliance status of its vendors.

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